

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re:	:
	:
Center City Healthcare, LLC d/b/a Hahnemann University	:
Hospital, <i>et al.</i> ,	:
	:
Debtors.	:
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Center City Healthcare, LLC, Philadelphia Academic Health	:
System, LLC, St. Christopher's Healthcare, LLC, Philadelphia	:
Academic Medical Associates, LLC, HPS of PA, L.L.C., SCHC	:
Pediatric Associates, L.L.C., St. Christopher's Pediatric Urgent	:
Care Center, L.L.C., SCHC Pediatric Anesthesia Associates,	:
L.L.C., StChris Care at Northeast Pediatrics, L.L.C., TPS of PA,	:
L.L.C., TPS II of PA, L.L.C., TPS III of PA, L.L.C., TPS IV of	:
PA, L.L.C. and TPS V of PA, L.L.C.,	:
	:
Plaintiffs,	:
	:
v.	:
	:
MBNF Investments, LLC, American Academic Health System,	:
LLC, Philadelphia Academic Health Holdings, LLC, Front Street	:
Healthcare Properties, LLC, Front Street Healthcare Properties II,	:
LLC, Broad Street Healthcare Properties, LLC, Broad Street	:
Healthcare Properties II, LLC, Broad Street Healthcare Properties	:
III, LLC, Philadelphia Academic Risk Retention Group, LLC,	:
Paladin Healthcare Capital, LLC, Joel Freedman, Stella	:
Freedman, Svetlana Attestatova, and Kyle Schmidt,	:
	:
Defendants.	:
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Chapter 11
Case No. 19-11466 (MFW)
Jointly Administered

Adversary Proceeding No. 21-50991 (MFW)

WAIVER OF SERVICE OF SUMMONS

TO: Center City Healthcare, LLC, *et al.*
c/o Saul Ewing Arnstein & Lehr LLP
Attn: Mark Minuti, Esquire.
P. O. Box 1266
1201 N. Market Street, Suite 2300
Wilmington, Delaware 19899

I, Joel Freedman, acknowledge receipt of your request that I waive service of a summons and the complaint in the above-captioned Adversary Proceeding pending in the United States Bankruptcy Court for the District of Delaware, Adversary Proceeding No. 21-50991 (MFW) (the "Adversary Proceeding").


I have also received a copy of the complaint in the Adversary Proceeding.

I agree to save the cost of service of a summons and the complaint in this Adversary Proceeding by not requiring that I be served with judicial process in the manner provided by Rule 7004 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

I understand that I will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I must file and serve an answer or a motion under Federal Rule 12 made applicable to this proceeding by Bankruptcy Rule 7012, at least, within 60 days from 9/9/21, the date when this request was sent. If I fail to do so, a default judgment will be entered against me.

9/9/2021
Date



Mr. Joel Freedman
~~Paladin Healthcare Capital, LLC~~
~~222 N. Pacific Coast Highway, Suite 900~~
~~El Segundo, CA 90245~~